



**City & County of San Francisco  
Department of Public Health**

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**Office of Compliance and Privacy Affairs**

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**BACKGROUND**

- DHCS published and provided training on the FY21-22 chart audit protocol on 12/13/2021. BHS Compliance is providing you with that DHCS training and training attachments (i.e., audit protocol and reasons for recoupment)
- BHS Compliance has updated their SMHS audit protocol—this will be used to audit services dated between 1/1/2022 and 6/30/22

| Audit Protocol Item & Source of Guidance  | Rating (Y, N, N/A) | Auditor Comments |
|---|--------------------|------------------|
| <p><i>Is there a valid assessment that is finalized and signed by a LPHA and/or registered/waivered LPHA?</i></p> <p><i>Source: DHCS (12/07/2021) Annual Review Protocol for Specialty Mental Health Services &amp; Other Funded Services (p66). Documentation Manual.</i><br/><i>Personal Communication from BHS Compliance Officer effective 6/1/2021</i></p> |                    |                  |
| <p><i>Is the primary diagnosis a SMHS diagnosis?</i></p> <p><i>CCR Title 9, Chap 11, Sec 1830.205(b)(1)(A-R); 1830.210; Mental Health Plan Contract, Exhibit A, Attachment I)</i></p>   |                    |                  |
| <p><i>Was the diagnosis based on the criteria sets in the DSM-5?</i></p> <p><i>DHCS (12/07/2021). Annual Review Protocol for Specialty Mental Health Services &amp; Other Funded Services (p64)</i></p>   |                    |                  |
| <p><i>Is the diagnosis determined by a LPHA and/or waived or registered LPHA? (Co-signed by LPHA if graduate student determined the diagnosis.)</i></p> <p><i>Source: BHS Documentation Manual (p16).</i></p>   |                    |                  |
| <p><i>Does the TPOC include goals and objectives?</i></p> <p><i>Source: DHCS (12/07/2021). Annual Review Protocol for Specialty Mental Health Services &amp; Other Funded Services (p69).</i></p>   |                    |                  |
| <p><i>Is there a valid TPOC that is finalized and signed by a LPHA and/or registered/waivered LPHA?</i></p> <p><i>Source: BHS Documentation Manual (page 38, "effective date" is the date that the LPHA or registered/waivered LPHA electronically signed the TPOC).</i></p>  |                    |                  |
| <p><i>Is there a signature (or electronic equivalent) of the person providing services including the name, type of professional degree, and licensure or job title, and date on the TPOC?</i></p> <p><i>Source: DHCS (12/07/2021). Annual Review Protocol for Specialty Mental Health Services &amp; Other Funded Services (p69).</i></p>                       |                    |                  |
| <p><i>Is the TPOC co-signed by a LPHA staff or Registered/Waivered LPHA staff when required (e.g., TPOC created by MHRS, Graduate Student, etc.)?</i></p> <p><i>Source: DHCS (12/07/2021). Annual Review Protocol for Specialty Mental Health Services &amp; Other Funded Services (p70).</i></p>   |                    |                  |

Color Coding: **Blue** = Assessment; **Green** = Client Plan; **Yellow** = Progress Notes

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|--|--------------------|------------------|
| <p>Is there documentation of beneficiary's participation and agreement with the TPOC as evidenced by the beneficiary's signature on the plan, or reference to beneficiary's participation in the body of the plan or in a progress note?</p> <p><i>Reference DHCS Annual Review Protocol FY 21-22 page 70 Section 8.4.7;</i><br/> <i>Source: CCR, title 9, chapter 11, section 1810.440 (c)(2)(A)(B)</i></p>   |                    |                  |
| <p>Does the date of service documented in the progress note match the date of service claimed? ("Recovery" is limited to examples where the MHP is unable to provide other documented evidence that the progress note with the "mismatched" date actually corresponds to the claim in question, and/or was due to a clerical error).</p> <p><i>Source: DHCS (12/07/2021). Medi-Cal Specialty Mental Health Services Reasons for Recoupment FY 2021/2022 (page 2, item 6)</i></p> |                    |                  |
| <p><b>For Adult Residential Treatment Only:</b> The standard is met if the service date is covered by a weekly summary (or 7 consecutive daily notes using the standard week).</p> <p><i>Source: BHS Documentation Manual (page 91)</i></p>  |                    |                  |
| <p><b>For Crisis Residential Only:</b> The standard is met if the service date is covered by a daily note.</p> <p><i>Source: DHCS (12/07/2021). Annual Review Protocol for Specialty Mental Health Services &amp; Other Funded Services (p73)</i></p>  |                    |                  |
| <p>Is there a signature of the person providing the service (or electronic equivalent) with the name, degree, license, or job title?</p> <p><i>Source: DHCS (12/07/2021). Annual Review Protocol for Specialty Mental Health Services &amp; Other Funded Services (p73).</i></p>   |                    |                  |
| <p>Is the service provided within the provider's Scope of Practice?</p> <p><i>Source: DHCS (12/07/2021). Medi-Cal Specialty Mental Health Services Reasons for Recoupment FY 2021/2022 (page 1, item 3)</i></p>  |                    |                  |
| <p>Is the progress note co-signed by an LPHA or MHRS when required?</p> <p><i>Source: BHS Compliance Unit (January 2018). Documentation Requirements At-A-Glance.</i></p>  |                    |                  |

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|---|--------------------|------------------|
| <p>Are group notes properly apportioned to all beneficiaries, including documentation of “total number” of participants and include an “individualized” note for each client participant? (“Recovery” is limited to apportionments resulting in “overbillings”).</p> <p><i>Source: DHCS (12/07/2021). Medi-Cal Specialty Mental Health Services Reasons for Recoupment FY 2021/2022 (page 2, item 9)</i></p>  |                    |                  |
| <p>Does the service claimed match the service documented in the progress note? (“Recovery” is limited to mismatches resulting in “overbillings”).</p> <p><i>Source: DHCS (12/07/2021). Medi-Cal Specialty Mental Health Services Reasons for Recoupment FY 2021/2022 (page 1, item 5)</i></p>   |                    |                  |
| <p>Is the claim a reimbursable (billable) service? For example, the Progress Note or other clinical documentation indicated “No show” or “Appointment cancelled” but a service (other than chart review) was still claimed; the documented service provided did not meet the applicable definition of a SMHS</p> <p><i>Source: DHCS (12/07/2021). Medi-Cal Specialty Mental Health Services Reasons for Recoupment FY 2021/2022 (page 2, item 10)</i></p>   |                    |                  |
| <p>For a service that is delivered by more than one staff at the same time, does each note meet the progress note standards: (a) identifies each staff member's involvement in the context of the mental health needs of the beneficiary; (b) each member's exact minutes; (c) each member's signature?</p> <p><i>Sources: DHCS (12/13/2021). Training on Annual Protocol (page 20); DHCS (12/07/2021). Annual Review Protocol for Specialty Mental Health Services &amp; Other Funded Services (pgs 72-73). Medi-Cal Specialty Mental Health Services Reasons for Recoupment FY 2021/2022 (page 2, item 8)</i></p> |                    |                  |
| <p>Are the units of time claimed for the service equal to the units of time of documented in the progress note? (“Recovery” is limited to mismatches resulting in “overbillings”).</p> <p><i>Source: DHCS (12/07/2021). Medi-Cal Specialty Mental Health Services Reasons for Recoupment FY 2021/2022 (page 2, item 7)</i></p>  |                    |                  |